

ROSS JAY LAWSON,

Plaintiff,

Case No.: 00-6009-CIV-DIMITROULEAS
Magistrate Judge SORRENTINO

v.

KEN JENNE, WILLIAM HITCHCOCK,
BROWARD COUNTY DEPARTMENT OF
CORRECTIONS AND REHAB., ET AL,

PLAINTIFF ROSS JAY LAWSON'S RESPONSE TO
DEFENDANTS', JENNE, HITCHCOCK AND BROWARD
COUNTY'S, MOTION FOR EXTENSION OF TIME

00 DEC 13 AM 8 46
CLERK'S OFFICE
CLERK OF JUSTICE
S.D. OF FLA - MIAMI

COMES NOW the Plaintiff, ROSS JAY LAWSON, Pro,se, and gives this response to Defendants', JENNE, HITCHCOCK AND BROWARD COUNTY'S, MOTION FOR EXTENSION OF TIME.

1. So as the Attorneys for the Defendants may have time to review the truth in which the Plaintiff has put forth in his response to the Defendant's summary judgement, and Justice be brought to light, the Plaintiff states that the Defendants should indeed be allowed an extension untill December 11, 2000, in which to respond to the Plaintiff's "PLAINTIFF, ROSS JAY LAWSON'S RESPONSE TO DEFENDANT JENNE, HITCHCOCK, AND BROWARD COUNTY'S MOTION FOR SUMMARY JUDGEMENT AND INCORPORATED MEMORANDUM OF LAW"
2. Although it should be noted that the Defendant's "DEFENDANTS' JENNE, HITCHCOCK AND BROWARD COUNTY'S, MOTION FOR EXTENSION OF TIME" bears a CERTIFICATE OF SERVICE which reads as follows;

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned is unable to confer with Plaintiff to discuss the foregoing motion. The undersigned's only method of communication with Plaintiff is via correspondence as he is incarcerated. As such a good faith attempt to discuss the issues in the motion was not made and a true and correct copy of the foregoing was sent via U.S. Mail this 4th day of December, 2000 to: ROSS JAY LAWSON, Pro Se Plaintiff, FL 97-9905, Post Office Box 9356, Fort Lauderdale, Florida 33310

WS/CG

The Plaintiff states that on the issue of the Defendant's CERTIFICATE OF SERVICE, the Defendant's Attorney TAMATHA S. ALVAREZ Fla. Bar No.: 0151467, has stated that the Plaintiff ROSS JAY LAWSON, is incarcerated, and that Ms ALVAREZ's only method to confer with the Plaintiff was/is via correspondence. This issue is false. Any Attorney can come personally and visit with and inmate incarcerated in the B.C.M.J. by showing up with a Fla. Bar Card, between the hours of 7:30am untill 9:30pm. Also in light of the fact that Ms ALVAREZ represents the Defendants she has full ability to contact the Plaintiff by phone, as all Defendants would allow for her to do so upon her request.

3. It should also be noted that the Plaintiff in this action has requested/attempted to meet with the Attorneys of record for the Defendant numerous times by writing letters and calling them on the phone. And all attempts at such have failed to persuade such Attorneys from meeting and possibly resolving this matter long ago.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. MAIL this 7th day of December 2000, to ADORNO & ZEDER, P.A. Counsel for Defendants 888 S.E. 3rd AVE. Suite 500, Fort Lauderdale, FL. 33335-9002.

BY Ross Jay Lawson
ROSS JAY LAWSON FL97-9905
P.O. BOX 9356
Fort Lauderdale, FL. 33310